

**PD5 Keller Opp Exh Exh E -
Keller Dep p. 370**

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2 IN THE UNITED STATES DISTRICT COURT
3 FOR THE NORTHERN DISTRICT OF OHIO
4 EASTERN DIVISION

5 -----X

IN RE: NATIONAL PRESCRIPTION MDL No. 2804
6 OPIATE LITIGATION,

Case No. 17-MD-2804

7 This document relates to:

8 All Cases Hon. Dan A. Polster

9 -----X

10 * HIGHLY CONFIDENTIAL *

11 * SUBJECT TO FURTHER CONFIDENTIALITY REVIEW *

12 VIDEOTAPED DEPOSITION

13 OF

14 LACEY R. KELLER

15 New York, New York

16 Thursday, June 13, 2019

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Reported by:

24 ANNETTE ARLEQUIN, CCR, RPR, CRR, RSA

25

1

2 on.

3

 You selected a 30-day cutoff as
4 part of your analysis of Mallinckrodt's
5 peculiar orders?

6

 A. Sure.

7

 Q. How did you determine that as the
8 window of time?

9

 A. So in reviewing the SOMS
10 documentation, many algorithms reflected a
11 30-day lookback. It seemed an appropriate
12 lookback period. And also looking at
13 chargeback requests, some companies, I'm
14 sorry, some distributors submitted them,
15 what appeared to be maybe on weekly basis,
16 some on a daily basis, some on monthly
17 basis. It was all over the place. So the
18 30 days was chosen based off of those
19 factors.

20

 Q. Okay. And without consideration
21 of any distributors's inventory management
22 practices, correct?

23

 A. As I stated earlier, I'm not an
24 expert in inventory management, nor did I
25 review those types of documents.